

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** : **CHAPTER 13**  
:   
Matthew John Majernik : **NO.** 22-11096-MDC  
:

**MOTION TO SELL REAL ESTATE**

Real Estate To Be Sold: 825 Wyoming Avenue, Croydon, PA 19021  
and the vacant lot.

The above named Debtor respectfully moves this Court as follows:

1. On April 29, 2022, the above Debtor filed the instant Chapter 13 Petition, and jurisdiction is based on 28 U.S.C. Sections 1334 and 157.
2. This motion requests permission to sell the said real estate located at 825 Wyoming Avenue, Croydon, PA 19021 and the vacant lot.
3. There is a mortgage on this property which will be paid off at settlement.
4. The terms and conditions contained in the attached Agreement of Sale, dated January 31, 2023, to JMAC Investments Signing Representative James McCafferty for the sale price of \$258,001.00 (two hundred fifty eight thousand and one dollars).
5. The Debtor believes the above referenced price to be fair and reasonable.
6. The result of this sale will be to pay off the mortgage in full and will also result in payment to Mary Majernik, Tom and Janet Swayne as well as several joint debts.

**TREATMENT OF LIEN CREDITORS**

7. Debtor seeks an Order from this Court approving the sale of said real estate with the liens of any creditor attaching to the proceeds of the sale.

8. This Agreement of Sale is in the best interests of the Debtor, the estate and the creditors.

9. A final settlement sheet will be supplied prior to the hearing date.

WHEREFORE, the Debtor respectfully requests this Honorable Court to issue an Order approving the sale of the real estate, and with any encumbrances being paid in full at settlement and for such further relief as this Court deems just and proper.

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor  
Suite 160 West, Curtis Ctr.  
601 Walnut Street  
Philadelphia, PA 19106  
215-625-9600

Dated: 03/02/2023